

SUSMAN GODFREY L.L.P.

September 7, 2024

Hon. Ona T. Wang
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *The New York Times Company v. Microsoft Corporation, et al.*,
Case No.: 23-cv-11195-SHS: Errata to The Times's Opposition to
OpenAI's Motion to Compel at Dkt. 238

Dear Magistrate Judge Wang:

Please take notice of the following errata and correction to Plaintiff The New York Times Company's Letter Response in Opposition to OpenAI's September 3 request to compel the production of documents. Dkt. 238. Citations in the Letter Response in Opposition and Exhibit 1 were incorrect or missing. A substitute Letter Response and Exhibit 1 with those corrections are attached.

Respectfully submitted,

/s/ Ian B. Crosby
Ian B. Crosby
Susman Godfrey L.L.P.

/s/ Steven Lieberman
Steven Lieberman
Rothwell, Figg, Ernst & Manbeck

cc: All Counsel of Record (via ECF)